LAW OFFICES COTCHETT, PITRE & MCCARTHY, LLP

PLAINTIFFS' JOINT PROPOSED COVER LETTER REGARDING PROTOCOL FOR SETTLEMENT OF CURRENTLY UNFILED MINOR'S CASES

On May 1, 2015, a Case Management Conference call was held with this Court. The Court requested that the Parties submit a proposed cover letter regarding the protocol for settlement of minor's cases which have yet to be filed with the United States District Court Northern District of California, in MDL No. 2497.

Accordingly, the parties hereby attach as **EXHIBIT 1**, a true and correct copy of the Plaintiffs' Proposed Cover Letter Regarding Protocol for Settlement of Currently Unfiled Minor's Cases.

Pursuant to this protocol, a minor Plaintiff who has not previously filed their case with this Court, and who has reached a settlement with Defendants, shall review and follow the "Order Following May 30, 2014 Case Management Conference, Including Process For New Complaints," dated June 13, 2014, (hereafter, "Order Regarding Process for New Complaints") (Court Docket #148).

Once the Plaintiff has complied with the June 13, 2014 Order, the Plaintiff must provide the Court's chambers courtesy copies of all filings that demonstrate compliance with the Order Regarding Process for New Complaints. In addition, counsel for Plaintiff will submit a cover letter in the form attached hereto as **EXHIBIT 1**, together with courtesy copies of all pleadings referenced therein.

Dated: May 15, 2015

Respectfully submitted,

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